

# Sponsorships Policy

# Contents

- 1. Purpose & objective..... 3**
- 2. Policy owner ..... 3**
- 3. Applicability ..... 3**
- 4. Definition ..... 3**
- 5. Guiding principles and operating procedures ..... 4**
  - 5.1 Guiding principles..... 4**
  - 5.2 Operating procedures ..... 5**
    - 5.2.1 Anticorruption Due Diligence..... 5**
    - 5.2.2 Approval Process..... 5**
- 6. Traceability ..... 7**

## **1. Purpose & objective**

The purpose of this Policy is to provide guidance and establish requirements for the management of any Sponsorship activities by Prysmian Group (hereinafter the "Group").

## **2. Policy owner**

Group Corporate & Business Communications and Public Affairs owns this Policy and is responsible for periodically reviewing and updating it to ensure it accurately reflects regulatory, best practice, or business developments.

## **3. Applicability**

This Policy applies to all Prysmian Group Functions and Companies involved in the request, approval and provisions for Sponsorships.

## **4. Definition**

"Sponsorships" refers to any payment in favour of third parties for displaying the brand and/or promoting the image of the Group, with the aim of increasing the reputation and prestige of the Group and creating value for its shareholders.

## 5. Guiding principles and operating procedures

### 5.1 Guiding principles

The choice of which activities to sponsor should meet specific defined criteria designed to improve the process and avoid requests that are not in line with the Group's mission, vision, values, Code of Ethics, strategic guidelines, the policies put in place and the Organizational Model pursuant to the 231/2001 Legislative Decree.

*What can be sponsored:*

- initiatives related to the business/corporate activities of the Group and carried out in sectors related to its activities
- institutional/corporate carried out in social, cultural, sports or artistic field

and may be:

- sponsorship of an event, roadshow (digital or physical)
- sponsorship of a trade show or exhibition (digital or physical)
- institutional activities
- sponsorship of an editorial event from newspapers or magazine
- sponsorship of associations or individuals
- technical sponsorships

The projects to be sponsored should always be characterized by:

- consistency with the values, mission and vision of the Group and corporate communication strategies
- the morality and integrity of the beneficiary

*What cannot be sponsored:*

- Activities that are in any way illegal, dangerous or harmful for the Group and its reputation
- Activities in conflict with the Group's mission, vision, values, Code of Ethics, strategic guidelines, policies put in place and the Organisational Model pursuant to Legislative Decree 231/2001
- Associations and organizations which discriminate on the basis of race, skin color, sex, religion, nationality or ethnicity.

The Group also prohibits:

- promising or paying sums of money, promising or granting goods in kind or other benefits to third parties, such as, for example, customers, suppliers, Public Administration Bodies, public institutions or other organisations with the aim of promoting or favouring the Group's interests
- resorting to other forms of aid or contributions which have the same purpose as those prohibited above

## **5.2 Operating procedures**

Based on the abovementioned guidelines, on the Group's Code of Ethics and on its principles of conduct, Prysmian Group has established and formalized a procedure for assessing the sponsorships' beneficiaries, approving and monitoring sponsorships, identifying the thresholds beyond which a stricter approval flow is required.

### **5.2.1 Anticorruption Due Diligence**

The first step of the operating procedure is that the beneficiary of any sponsorship will have to comply with the ethical conduct principles adopted by the Group.

In fact, before proceeding with any sponsorship, an anti-corruption due diligence will be carried out on the potential beneficiary. This assessment is performed via a dedicated online platform, in accordance with the "Third Party Program" Policy and the ISO 37001 Standards as well as the Group's Antibribery Management System.

If the due diligence provides a positive result, the sponsorship's approval process will proceed; otherwise, if the due diligence result is negative, the approval process is interrupted.

### **5.2.2 Approval Process**

#### **a) Management Plan**

Every year, when preparing the Management Plan, the Group Corporate & Business Communications and Public Affairs prepares an overall budget for its Management. Within the budget, approved by the Group CEO, the preferred areas of activity are identified and considered strategic in line with the Group's Communication Plan, including sponsorship activities.

## **b) Identification of sponsorship initiatives and business partner**

The Head of the Group Corporate & Business Communications and Public Affairs Department is active in identifying initiatives and opportunities for commercial sponsorship or for receiving requests for sponsorship from third parties in written form directly.

Initiatives and opportunities for commercial sponsorship may also be identified by other Group Functions or subsidiaries.

In all cases the Head of Group Corporate & Business Communications and Public Affairs is responsible for assessing the appropriateness of the amount of sponsorship in relation to the specific request and, if possible, to other similar sponsorship operations.

## **c) Approval of individual sponsorship initiatives**

Based on the monetary value of the sponsorship and before any disbursement of funds, the Group differentiates the approval process as follows:

- o **for a sponsorship of less than € 50,000**, the Group's Corporate & Business Communications and Public Affairs, Compliance and Tax Functions must be properly informed via e-mail
- o **for a sponsorship exceeding € 50,000**, the Group's Corporate & Business Communications and Public Affairs, Compliance and Tax Functions must formally approve via e-mail the initiative prior to the disbursement of any funds. Final approval is required by the CEO.

Following the above approval process for the disbursement of funds, the Head of Group Corporate & Business Communications and Public Affairs signs the sponsorship request within the limits of his/her power of attorney.

Above the Head of Group Corporate & Business Communications and Public Affairs' power of attorney, the CEO will be required to sign the sponsorship request.

## **d) Negotiation and contractual commitment**

All sponsorship initiatives must be formalized in a contract/agreement, which, where necessary and required, shall be drawn up, or at least revised, by Legal and Corporate Affairs and Group Compliance Function for 231 compliance.

In the sponsorship contracts/agreements, shall be always indicated:

- the object of the sponsorship (in kind and/or in cash)
- a description of how sponsorship needs to be implemented
- the duration of the contract
- the payment terms (if applicable)
- the commitment of the sponsor to observe the ethical and behavioural principles adopted by the Group

## 6. Traceability

The traceability of the individual stages of the process managed and documentation archived (copy sponsorship contract) by the Group Corporate & Business Communications and Public Affairs' Function. With regards to approved sponsorship invoices, the Finance, Administration & Control Department (approved sponsorship invoices) is responsible for filing such documents.

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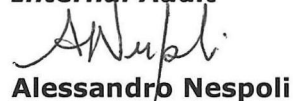
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